

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE**

Estate of Michele M. Walker)	
)	
v.)	Civil Action # 11-CV-421-PB
)	
New Hampshire Administrative Offices of)	
the Courts, et al.)	

PLAINTIFF'S ASSENTED-TO MOTION TO EXTEND DEADLINES

NOW COMES the Plaintiff, Estate of Michele M. Walker, by and through its attorney, Law Office of Leslie H. Johnson, PLLC, and files Plaintiff's Assented-To Motion To Extend Deadlines, and in support therefore, respectfully states as follows:

1. Trial in this matter is presently scheduled for the trial period beginning January 8, 2013.
2. Plaintiff propounded discovery upon Defendant on or about August 9, 2012 with answers due on or about September 12, 2012. Defendant has requested an extension to October 5, 2012 to provide answers to discovery due to other trial commitments, which extension was granted by Plaintiff.
3. Defendant filed its Motion For Summary Judgment (DN 15) on September 4, 2012. Plaintiff's Objection to Motion for Summary Judgment is due by on or about October 8, 2012.
4. The current discovery deadline is October 21, 2012. The parties need additional time to October 28, 2012 to complete discovery, including depositions and therefore seek an extension from October 21, 2012 to November 2, 2012.
5. In addition, Plaintiff requests an extension to file her Objection to Motion For Summary Judgment to November 9, 2012 as Plaintiff is in need of completing discovery prior to filing her Objection to Motion For Summary Judgment.

6. Defendant's counsel has been contacted and assents to this Motion.
7. These extensions are not expected to affect the scheduled trial date in January, 2013.
8. No memorandum of law is necessary as the granting of this motion is within the Court's discretion.

WHEREFORE, Plaintiff, respectfully requests this Honorable Court:

- A. Grant extension of Discovery deadline from October 21, 2012 to November 2, 2012;
- B. Grant Plaintiff until November 9, 2012 to file her Objection to Defendant's Motion For Summary Judgment; and
- C. Grant such other and further relief as this Court deems just and proper.

Respectfully submitted,
ESTATE OF MICHELE M. WALKER, Plaintiff
By its attorney,

Date: September ___, 2012

By: /s/ **LESLIE H. JOHNSON**
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CERTIFICATION

I hereby certify that on this ___ day of September 2012, copy of this Motion was electronically served through ECF on the following counsel: Mary Ann Dempsey, Esquire, Counsel for Defendants.

 /s/ **LESLIE H. JOHNSON**
Leslie H. Johnson, Esquire